

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PERFORADORA ORO NEGRO, S. DE R.L.  
DE C.V., *et al.*

Debtors in a Foreign Proceeding.

GONZALO GIL-WHITE, PERSONALLY  
AND IN HIS CAPACITY AS FOREIGN  
REPRESENTATIVE OF PERFORADORA  
ORO NEGRO, S. DE R.L. DE C.V. AND  
INTEGRADORA DE SERVICIOS  
PETROLEROS ORO NEGRO, S.A.P.I. DE  
C.V

Plaintiff,

-against-

ALP ERCIL; ALTERNA CAPITAL  
PARTNERS, LLC; AMA CAPITAL  
PARTNERS, LLC; ANDRES CONSTANTIN  
ANTONIUS-GONZÁLEZ; ASIA RESEARCH  
AND CAPITAL MANAGEMENT LTD.; CQS  
(UK) LLP; FINTECH ADVISORY, INC.;  
DEUTSCHE BANK MÉXICO, S.A.,  
INSTITUCIÓN DE BANCA MÚLTIPLE;  
GARCÍA GONZÁLEZ Y BARRADAS  
ABOGADOS, S.C.; GHL INVESTMENTS  
(EUROPE) LTD.; JOHN FREDRIKSEN;  
KRISTAN BODDEN; MARITIME FINANCE  
COMPANY LTD.; NOEL BLAIR HUNTER  
COCHRANE, JR; ORO NEGRO PRIMUS  
PTE., LTD.; ORO NEGRO LAURUS PTE.,  
LTD.; ORO NEGRO FORTIUS PTE., LTD.;  
ORO NEGRO DECUS PTE., LTD.; ORO

Chapter 15

Case No. 18-11094 (SCC)  
(Jointly Administered)

Adv. Pro. No. 19-01294

NEGRO IMPETUS PTE., LTD.; PAUL MATISON LEAND, JR.; ROGER ALAN BARTLETT; ROGER ARNOLD HANCOCK; SEADRILL LIMITED; SHIP FINANCE INTERNATIONAL LTD.; and DOES 1-100,

Defendants.

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that Scott D. Musoff, a member of the law firm of Skadden, Arps, Slate, Meagher & Flom LLP and of the Bar of this Court hereby enters his appearance in the above-captioned case (the “Adversary Proceeding”) as counsel for John Fredriksen, and requests, pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), that copies of all notices, documents, papers and pleadings in the Adversary Proceeding be given and served upon:

Scott D. Musoff  
SKADDEN, ARPS, SLATE,  
MEAGHER & FLOM LLP  
Four Times Square  
New York, New York 10036  
Phone:(212) 735-3000  
Fax: (212) 735-2000  
Email: scott.musoff@skadden.com

**PLEASE TAKE FURTHER NOTICE** that pursuant to Bankruptcy Code section 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph,

telex, facsimile transmission, e-mail or otherwise filed or made with respect to the Adversary Proceeding.

**PLEASE TAKE FURTHER NOTICE** that neither this request for notice and service nor any later appearance, pleading, claim, or suit is a waiver of any substantive or procedural right. Nor shall this request be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

Dated: September 17, 2019  
New York, New York

/s/ Scott D. Musoff  
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